

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

QJR, LLC,

Plaintiff

Versus

CASE NO 1:24-cv-00383-TBM-RPM

SECURIX, LLC, and  
JONATHAN MILLER, INDIVIDUALLY  
AND AS CHAIRMAN OF SECURIX LLC,

Defendants

**MOTION TO FILE EXHIBITS A AND B TO ANSWER TO COMPLAINT FOR  
DISSOLUTION, COUNTERCLAIM, PRAYER FOR TRIAL BY JURY, AND RELATED  
OBJECTIONS AND MOTIONS UNDER RESTRICTION**

NOW INTO COURT through undersigned counsel come defendants Securix, LLC and Jonathan Miller individually and in his capacity as chairman of Securix, LLC, and hereby move and represent as follows:

(1)

On or about December 20, 2024 Defendants filed their answer to the Complaint filed in the Chancery Court of Jackson County, Mississippi bearing docket number 30CH1:24-cv-01774-DNH and have attached Exhibits A and B.

(2)

The state court has entered an *ex parte* order sealing the entire state court record, and in order to avoid violation of the order of the state court, your defendants respectfully ask this Honorable Court to order that Exhibits A, the Operating Agreement and B, licensing agreement, to the Answer be filed under restriction so that only this Honorable Court and parties to the case can view these Exhibits.

WHEREFORE defendants SECURIX, LLC and JONATHAN MILLER,  
INDIVIDUALLY AND AS CHAIRMAN OF SECURIX LLC respectfully ask that this  
Honorable Court order that Exhibits A and B appended to the Answer be filed under restriction  
so that it can be viewed only by this Honorable Court and by the parties to this litigation.

Respectfully submitted, this the 20<sup>TH</sup> day of December, 2024.

SECURIX, LLC and  
JONATHAN MILLER, individually and  
as Chairman of SECURIX, LLC

/s/ Albert R. Jordan, IV  
ALBERT R. JORDAN, IV  
MS Bar Roll # 102513  
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**CERTIFICATE OF SERVICE**

I do certify that I have this date, December 20, 2024, mailed through the United States Postal Service, postage prepaid, a true and correct copy of the above and forgoing to the following:

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/s/ Albert R. Jordan, IV  
ALBERT R. JORDAN, IV